

APPENDIX D

Agency/Organization Compliance Checklist

The Level IV A/OPC will ensure that all Billing Official accounts are reviewed on an annual basis throughout the fiscal year. Agencies/organizations will perform an annual review of Billing Official accounts, document any deficiencies, and have a copy of the review available for external review. An agency/organization

must be able to provide assurance that procedures, controls, and operations are adequate and in compliance with Army policy. An agency/organization is in compliance by having:

- a. Written procedures outlining such areas as property accountability for non-expendable items and coordination with the agency Information Management Officer when buying information technology items.
- b. Written guidance to Cardholders advising of office limits and when and how funding will be managed for each purchase card account.
- c. Adequate separation of duties.
- d. Records in good shape and easy-to-track billings with purchases.
- e. Documentation in files explaining any unusual situations, such as a buy that appears to have been a "split" but was not, or pre-purchase justification on an item that may seem questionable.
- f. Utilization of required/mandatory sources consistent with FAR 8.

Section II

Surveillance Checklist: Review of Billing Official Account

The following is a list of sample questions that can be used in developing local Level IV A/OPC surveillance checklists. For any “no” answers to these questions, provide additional information in a “Comments” section at the end.

- a. Does the Billing Official have a DD Form 577 that designates him or her as a Billing Official (Certifying Official)?
- b. Has the Billing Official received GPC and ethics training?
- c. Are all the Cardholders under the Billing Official appropriate (for example, the Billing Official’s supervisor(s) are not in any of his or her accounts)?
- d. Does the Billing Official review each of his or her Cardholder’s statements each month?
- e. Does the Billing Official certify and process the monthly billing statement within five business days of its receipt?
- f. Does the Billing Official promptly notify the Level IV A/OPC when a Cardholder departs, retires, or otherwise no longer needs a card?

- g. Has the Billing Official notified the Level IV A/OPC of any lost, stolen, or compromised cards within five business days of the loss/theft?**
- h. If the Billing Official also manages convenience check accounts, are quarterly surveillance reviews conducted?**
- i. Have all convenience checks on accounts under the Billing Official been written for less than \$2,500?**
- j. Has the Billing Official notified the installation Level IV A/OPC of any Cardholder/check-writer account procedure violations discovered?**
- k. Does the Billing Official coordinate card dollar limits with the installation Level IV A/OPC and installation Resource Manager when Cardholder accounts are established?**
- l. Does the Billing Official maintain original supporting documentation for closed Cardholder/check-writer accounts in accordance with FAR 4.805?**
- m. Does the Billing Official coordinate with the Property Book Office to verify that all purchased accountable property has been properly documented?**

- n. Does the Billing Official coordinate with the Resource Manager to establish funding for all Cardholders?
- o. Has the Billing Office complied with procedures covering the deployment of Cardholders?
- p. How many Cardholders under the Billing Official were reviewed by the Level IV A/OPC as a part of this annual review? Is this an appropriate number per the Army standard?
- q. Has an adequate Cardholder-to-Billing Official ratio been maintained?
- r. What is the percent of randomly selected transactions that were reviewed, out of the total number of transactions for the review period? Is this an appropriate percentage?
- s. Does the Billing Official ensure Cardholders maintain their purchase logs in the Servicing Bank's automated system?
- t. The Billing Official's HA evaluates, prepares, and certifies a DA form 11-2-R at least once every two years IAW DoD FMR 7000.14R, Chapter 33, Volume 5, para 3308 for all Certifying Officials appointed on a DD 577. A

copy of the certified DA Form 11-2-R shall be provided to the Chief of the Contracting Office.

Section III

Surveillance Checklist: Review of Cardholder/Check-Writer Accounts in the GPC Program

- a. Does the Cardholder have a letter delegating specified procurement authority from the DOC?
- b. Has the Cardholder received training on Army procedures for using the GPC?
- c. Has the Cardholder participated in refresher training sessions or received refresher training material?
- d. Does the Cardholder know and comply with his or her monthly spending limits?
- e. If the Cardholder is required to use both appropriated and non-appropriated funds, does he or she have a separate card for each type of funds?
- f. Are all purchases entered in the Servicing Bank's electronic purchase log for EDI accounts?
- g. Does the Cardholder obtain all required pre-purchase approvals and authorizations?

- h. Are the Cardholders' monthly spending limits justified by their buying activity?**
- i. Were all purchases made by the Cardholder authorized? If the answer is "No," describe in a "Comments" section at the end of this review.**
- j. Does the Cardholder reconcile all transactions in the Servicing Bank's electronic system within three business days of the end of the billing cycle?**
- k. Does the Cardholder safeguard his or her card (for example, by not allowing others to use his or her card)?**
- l. Does the Cardholder comply with the requirements to purchase items from mandatory sources in accordance with FAR 8?**
- m. Does the Cardholder rotate sources when placing repeat orders?**
- n. Does the Cardholder document all transactions that posted to the billing statement but were not received, and utilize a tracking system to verify their subsequent delivery?**
- o. Does the Cardholder maintain supporting documentation for his or her purchases?**
- p. Does the Cardholder reconcile all transactions and approve the billing statement within three business days of its receipt?**
- q. Does the Cardholder reconcile his or her transactions throughout the billing cycle?**
- r. Does the Cardholder follow the appropriate procedures for disputing transactions?**

- s. Has the Billing Official acted on behalf of the Cardholder during the review period?
- t. Does the Cardholder use the reallocation feature of the Servicing Bank's electronic system properly?

Section IV

Surveillance Checklist: Review of Convenience Check Accounts

- a. Have all checks been issued for less than \$2,500?
- b. Does the check-writer capture all of the necessary TD1099 data for reporting to the Internal Revenue Service (IRS)?
- c. Have all checks been written by the checking account holder?
- d. Have all checks been written for items to be delivered within 15 days?
- e. Have all checks been written for only authorized items (for example, no prohibited purchases)?
- f. If stop-payment actions were processed against any check, was the \$25 charge deducted from the funds available?
- g. Does the check-writer account for checks written but not processed by the Servicing Bank when reconciling his or her account, to ensure adequate funds are available?
- h. Has the check-writer received training on the GPC procedures from the Level IV A/OPC?
- i. Are checks stored in locked containers when not in use?

Section V

Comments

Comments are to be entered here.